

**REMARKS**

Claims 1, 3, 6, 12, 14, 16 and 21-26 are pending in the instant application. All of these claims stand rejected. Claims 1 and 2 are amended, and claims 21-26 are added herein. Reconsideration is respectfully requested in light of the amendments and remarks contained herein.

***Claim Rejections – 35 U.S.C. § 103***

Claims 1, 6, 12, and 16 stand rejected under 35 U.S.C. § 103(a) as being obvious over the combination of Crook (U.S. Patent Pub. No. 2003/0177203), Stuppy (U.S. Patent Pub. No. 2003/0054328), and Ladd (U.S. Patent Pub. No. 2004/0024897). The § 103 rejections of claims 3 and 14 further incorporate Rachman (U.S. Patent Pub. No. 2002/0182578).

Claim 1 recites the preparation of a plurality of deliverables for conversion to a plurality of different formats, where each deliverable includes an associated content item and a corresponding associated format to which to convert the associated content item. In this regard claim 1 has been amended to make explicit what was implicit. Claim 1 should not be construed to mean, however, that the number of different formats is necessarily the same as the number of deliverables. Claim 1 also requires converting the associated content items using a plurality of parallel processing threads, each thread corresponding to an associated deliverable, whereby each thread converts the associated content item to the corresponding associated format. In rejecting claim 1, the office action cites to paragraphs [0020]-[0021], [0024], and [0025] of Crook as teaching or suggesting this claim feature. Paragraphs [0020]-[0025] describe the conversion of a document from a Word format to an HTML format. This conversion is only to a singular format (HTML). Claim 1 specifically requires preparing a plurality of deliverables for conversion to a plurality of different formats for presentation. Because the cited portions of the reference do not teach or suggest this feature, it is respectfully requested that the § 103 rejection of claim 1 be withdrawn.

The Office's reliance on paragraphs [0013] and [0020] of Ladd for a plurality of threads to execute format conversion in parallel does not make up for the deficiency of Crook, even if combined for the sake of argument. Paragraph [0013] of Ladd does not indicate that the format conversion involves converting to a plurality of different formats in a parallel manner. To the contrary, the explicit text of Ladd suggests that format conversion occurs from one (single) format (a first format) to another (single) format (a second format), albeit by parallel threads:

One embodiment of a system for transforming an input data stream *in a first data format* of a *plurality of first data formats* to an output data stream *in a second data format* of a *plurality of second data formats* is depicted in FIG. 1. A plurality of input connector modules 100, 102, 104 receive respective input data streams 106, 108, 110. A plurality of input queues 112, 114 store the received input data streams 106, 108, 110. A plurality of job threads 116, 118, 120, 122 are operatively connected to respective input queues 112, 114. Each job thread (116, 118, 120, 122) in parallel with at least one other job thread (116, 118, 120, 122) formatting a stored input data stream to produce an output data stream (124, 126, 128, 130). (Emphasis added.)

The Office's reference to the "format codes" of Crook does not remedy the above-noted deficiency of Ladd since Ladd evidently converts from one single format to another single format. As noted above, Crook converts from one single format to another single format as well. Thus, even if hypothetically combined, the applied references would not yield the claimed subject matter.

Accordingly, for at least these reasons, withdrawal of the rejection and allowance of claim 1 is respectfully requested.

A similar feature is recited in claim 12, which is rejected for similar reasons as claim 1. Therefore, it is respectfully requested that the § 103 rejection of claim 12 be withdrawn for similar reasons as offered for claim 1.

Claims 21-26 have been added. These claims are allowable at least by virtue of dependency and recite further distinguishing subject matter. Claims 21 and 24 recite that the corresponding associated format to which to convert the associated content item is external to the content item. These claims are supported by paragraph [0036] of the application at issue where a request includes a selected content item and a selected file format to which to convert the selected content item. It is respectfully submitted that this feature is not shown in the cited references. For example, the discussion of format codes in paragraphs [0020]-[0025] of Crook describes format codes within the source Word document that are converted to HTML codes as described in paragraph [0022]. The Word document format codes are within the source Word document and are, thus, outside the scope of claims 21 and 24.

Claims 22 and 25 recites that the corresponding associated format indicates a file format to which to convert an associated content item. These new claims are also supported by paragraph [0036] of the application at issue. It is respectfully submitted that this claim is also allowable.

Claims 23 and 26 recites that the converting includes translating text of a content item to the specified translated human language when the specified translated human language differs from the language of the text of the content item. These claims are supported by paragraph [0033]. It is respectfully submitted that the cited references do not teach or suggest this claim feature. For example, cited paragraph [0067] of Stuppy describes that based on student profile data, instructional material such as math problem sets may be transformed to problems in Spanish for Hispanic students. This is not a teaching of the explicitly recited translation of claims 23 and 26. Presumably, the instructional material of Stuppy is stored in multiple versions, such as an English version, a Spanish version, etc. One of these versions is then displayed based on a setting in a student's profile. Claims 23 and 26 requires an active

translation of the text of a content item, not simply a display of a stored different version of the content item. Thus, it is respectfully submitted that claims 23 and 26 are also allowable.

It is noted that the assignee has not presented arguments herein with respect to certain dependent claims in the instant application. This is done without prejudice to the assignee's right to present arguments regarding each of the dependent claims at any point in the future. Further, since all of the dependent claims in the instant application depend from independent claims that are patentable over the cited references, the dependent claims are themselves patentable for at least the reasons set forth with respect to the independent claims.

### **CONCLUSION**

For the foregoing reasons, assignee respectfully submits that the pending claims are allowable. Therefore, the examiner is respectfully requested to pass this case to issuance.

The Commissioner is authorized to charge any fees that may be required by this paper to Jones Day Deposit Account No. 503-013.

Respectfully submitted,

Date: June 4, 2009

By: \_\_\_\_\_



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